

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, JANE HAMILTON,  
SERGIO DELEON, FLOYD J. CARRIER,  
ANNA BURNS, MICHAEL MONTEZ,  
PENNY POPE, OSCAR ORTIZ, KOBY  
OZIAS, JOHN MELLOR-CRUMLEY,  
JANE DOE, JOHN DOE, LEAGUE OF  
UNITED LATIN AMERICAN CITIZENS  
(LULAC), and DALLAS COUNTY, TEXAS,

Case No. 2:13-cv-00193

*Plaintiffs,*

V.

RICK PERRY, Governor of Texas; and JOHN STEEN, Texas Secretary of State,

*Defendants.*

**PLAINTIFFS', MARC VEASEY, ET. AL.  
RULE 26 INITIAL DISCLOSURES**

Plaintiffs, Marc Veasey, Jane Hamilton, Sergio DeLeon, Floyd J. Carrier, Anna Burns, Michael Montez, Penny Pope, Oscar Ortiz, Koby Ozias, John Mellor-Crumley, Jane Doe, John Doe, League of United Latin American Citizens (LULAC), and Dallas County, Texas, (collectively “Plaintiffs”) make this Rule 26 Initial Disclosures as follows:

**(a)(1)(A):** The name, and if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

## **Response:**

## 1. Marc Veasey Jane Hamilton

Sergio DeLeon  
Floyd J. Carrier  
Anna Burns  
Michael Montez  
Penny Pope  
Oscar Ortiz  
Koby Ozias  
John Mellor-Crummey  
Jane Doe  
John Doe  
League of United Latin American Citizens (LULAC)  
Dallas County, Texas

The above referenced names and entities are Plaintiffs in the Veasey case.

United States of America

Consolidated Plaintiffs

2. Rick Perry, Governor of Texas and  
John Steen, Texas Secretary of State,  
State of Texas,

The above referenced individuals and the State of Texas are Defendants.

Steve McGraw

Consolidated Defendants

3. Texas Association of Hispanic County Judges and County Commissioners  
and Maria Longoria Benevides  
Texas League of Young Voters Education Fund and Imani Clark  
Texas State Conference of NAACP Branches  
Mexican American Legislative Caucus of the Texas House of  
Representatives

The above referenced individuals and entities are Plaintiff Intervenors.

5. True the Vote, and officers or members of the organization

The above referenced entity has moved to intervene as a Defendant.

6. Current and former officials, employees, and counsel of the State of Texas — including but not limited to the Texas Secretary of State's Office, the Texas Division of Elections, the Texas Department of Public Safety, other Texas offices responsible for various forms of accepted identification and for documentation necessary for obtaining accepted identification, and Texas county election officials — will likely have discoverable information regarding (a) the administration of elections in Texas, (b) the various forms of identification in Texas, procedures for obtaining such identification and necessary documentation for obtaining identification, (c) the history, development, enactment, and implementation plans for implementation of S.B. 14. (d) the actual implementation of the Voter ID law in Texas beginning on or about June 26<sup>th</sup>, 2013.
7. Persons who testified in the legislative proceedings related to S.B. 14 will likely have discoverable information regarding the administration of elections in Texas and the history, development, enactment, and plans for and actual implementation of S.B. 14.
8. Current and former Texas state legislators and legislative staff will likely have discoverable information related to the history, development, enactment, and plans for and actual implementation of S.B. 14.
9. Persons who submitted comments to the Attorney General, or otherwise talked to representatives from the Department of Justice during the Attorney General's administrative review of S.B. 14 pursuant to Section 5 of the Voting Rights Act, 42 U.S.C. § 1973c ("Section 5"), will likely have discoverable information related to the history, development, enactment, plans for implementation, and possible effects of S.B. 14.

10. Current and former officials, employees, and counsel of the individual county clerks and/or election administration offices of the 254 counties in Texas responsible for administering elections — will likely have discoverable information regarding (a) the administration of elections in Texas, before and after the implementation of the Voter ID law in Texas; (b) the various forms of identification in Texas, procedures for obtaining such identification and necessary documentation for obtaining identification; (c) the history, development, enactment, and implementation plans for implementation of S.B. 14; and (d) the actual implementation of the Voter ID law in Texas beginning on or about June 26<sup>th</sup>, 2013.
11. Sandra Lee Watts  
Nueces County Courthouse,  
901 Leopard St, Suite 904  
Corpus Christi, TX 78401  
(361) 888-0436

Sheila Korte  
3678 Hidden Drive, #1402  
San Antonio TX 78217  
(210) 657-9030

Evelyn Brickner  
3678 Hidden Drive, #1402  
San Antonio TX 78217  
(210) 657-9030

Peggy Draper Herman  
13818 Brays Forest  
San Antonio TX 78217  
(210) 657-3257

Gordon Benjamin  
902 Nevada Street  
San Antonio TX 78203  
(210) 309-1644

Cynthia Thomas  
(469) 237-0601

Gabriella Lucero  
(214) 707-7966

Ed Sills

Garcia Sills

Krissi Trumeter

Lindsay Smith

Kyle Nielson  
Houston TX

Gail Boudreaux  
Harris County, TX  
(713) 423-5044

Kate Owen  
Austin TX  
(512) 775-7057

Carol Anderson

Dorothy Card

Chuck Elkins

Ismael Morin

Linda Britten

James Claude Wright, Jr. aka Jim Wright

Lesley Evans

Stephanie Cochran

Jonathan Bernstein

Kendall McCook  
Fort Worth, TX

Janine Cicadas

Bartle Doo

Juan Quiroz  
San Juan

Leah McInnis

Leticia San Miguel Van de Putte

Jacob Ramirez  
@Geronimosfoodtr

Stephanie Stradley

Ken Gandy

Nelda Calhoun

Tanya SuJong Tarr

Cat Garlit Bucher

Greg Trimble

Betsy McLellan

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Rebecca Mason

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Julie Smith

Cindy Salinas Green

Alberta Brown  
(214) 554-5780

Sara Horn

Jane Johnson

Attorney General Greg Abbott

@RuralBiztoday – Frisco TX

The people referenced above are believed to be Texas voters who are likely to have information about relevant issues, including problems that they as voters have had, or will have, exercising their voting rights under the new voter ID law. Some of these individuals have contacted Plaintiffs' counsel directly. Some of these individuals have been referred to Plaintiffs' counsel by individuals or organizations and some have been reported to have encountered voting problems in the print press or other media reports. Addresses and phone numbers currently known to Plaintiffs have been provided. Plaintiffs reserve the right to supplement these disclosures with additional names of individuals as well as with addresses and phone numbers.

John Stafford  
(409) 866-6907

Joseph McBride  
(210) 882-7122

Terry Combs

Marianna Cline  
Houston TX

John Oldham  
Fort Bend TX

Dana DeBeauvoir  
Travis County Clerk  
P O Box 149325  
Austin, Texas 78714  
(512) 854-9188

Cathy Courtney

Jacque Callanen  
Bexar County

Stan Stanart  
Harris County Clerk  
P O Box 1525  
Houston TX 77251  
(713) 755-6411

Stelena Evans

Dorie Cranshaw

David Rosen

Hazel Weathers

Rochelle Lyon

Dan Teed (the Harrison County Elections Administrator)

The people referenced above are election officials, election judges or clerks who are likely to have information about relevant issues, including problems that voters have had, or will have, voting under the new voter ID law and problems that elections administrators and personnel have had, or will have, implementing or administering the new voter ID law. Some of these individuals have contacted Plaintiffs' counsel directly. Some of these individuals have been referred to Plaintiffs' counsel by individuals or organizations and some have been reported to have encountered voting problems in the print press or other media reports. Addresses and phone numbers currently known to Plaintiffs have been provided. Plaintiffs reserve the right to supplement these disclosures with additional names of individuals as well as with addresses and phone numbers.

Anna Olivares

David Miller

LaKashia Wallace

Stacie B. Royster

Sondra Haltom  
Empower the Vote

The people referenced above are Texas community organizers and community leaders who are likely to have information about relevant issues, including problems that voters have had, or will have, voting under the new voter ID law and problems that elections administrators and personnel have had, or will have, implementing or administering the new voter ID law. Some of these individuals have contacted Plaintiffs' counsel directly. Some of these individuals have been referred to Plaintiffs' counsel by individuals or organizations and some have been reported to have encountered voting problems in the print press or other media reports. Addresses and phone numbers currently known to Plaintiffs have been provided. Plaintiffs reserve the right to supplement these disclosures with additional names of individuals as well as with addresses and phone numbers.

**(a)(1)(B):** A copy of, or a description by category and location of, all documents, data, compilations, and tangible things that are in the possession, custody, or controls of the party and the disclosing party may use to support its claims or defenses, unless solely for impeachment.

**Response:** (1) The following preclearance submissions made to the United States Attorney General pursuant to Section 5 of the Voting Rights Act:

1. Submission No. 2012-0122
2. Submission No. 2011-2775
3. Submission No. 2011-5073
4. Submission No. 2011-5552

- (2) Satellite map data showing location of Texas DPS offices in relation to minority and/or rural and/or urban populations in numerous counties including but not limited to Harris, Dallas and Bexar counties.
- (3) Declarations of Marc Veasey, Sheila Korte, Evelyn Brickner Floyd Carrier and Peggy Draper Herman attached as Exhibits 1-5.

**(a)(1)(C):** A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including material bearing on the nature and extent of damages.

**Response:** Plaintiffs are entitled to recover their reasonable and necessary court costs, expert fees and attorneys' fees to be described more fully in discovery, expert designations, and future court filings.

**(a)(1)(D):** Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment, which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**Response:** None.

Dated this \_\_\_\_\_ day of November, 2013.

Respectfully submitted,

**BRAZIL & DUNN**

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*Attorneys for Dallas County, Texas*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 21<sup>st</sup>, 2013, I served a true and correct copy of the foregoing via electronic mail on the following counsel of record:

/s/ Chad W. Dunn  
Chad W. Dunn